

December 30, 2024

Via ECF

The Honorable Joel H. Slomsky United States District Court 5614 James A. Byrne United States Courthouse 601 Market Street Philadelphia, PA 19106

RE: April Ploeger v. The Trustees of the University of Pennsylvania, E.D. Pa., No. 2:22-cv-02389-JHS

Dear Judge Slomsky:

On behalf of the Defendant, The Trustees of the University of Pennsylvania, this letter follows my letters to the Court dated October 10 and November 25, 2024 related to the expert deadlines in this case (docs. 31 and 34). This extension request is unopposed by Plaintiff's counsel.

When we last wrote to the Court on November 25, we still needed to schedule Plaintiff for two hours of vocational testing. That testing just occurred on December 18, 2024, and additional time is required to generate the expert reports. Given the delays associated with completing Plaintiff's expert testing, none of which are attributable to Penn, we respectfully request a further extension of the expert deadlines in this case by two weeks as follows:

	Current Deadline, per ECF	New Proposed Deadline
	Doc. 35	
Expert Reports	Jan. 2, 2025	Jan. 16, 2025
Rebuttal Expert Reports	Jan. 16, 2025	Jan. 30, 2025
Expert Depositions	Jan. 30, 2025	Feb. 13, 2025

At this time, I am also respectfully requesting a postponement of the trial of this case due to scheduling conflicts. I am scheduled to be out of town for my children's spring break from school the week of trial, April 21-25, 2025, although admittedly, I have not yet purchased flights or hotels. Therefore, I am respectfully requesting a telephonic conference with the Court to discuss the rescheduling of the trial.

Respectfully yours,

Leslie Miller Greenspan

Leslie Miller Greenspan

cc: Mart Harris, Esquire (via email)